

BORRELLI & ASSOCIATES

P.L.L.C.

www.employmentlawyernewyork.com

655 Third Avenue
Suite 1821
New York, NY 10017
Tel. No. 212.679.5000
Fax No. 212.679.5005

910 Franklin Avenue
Suite 200
Garden City, NY 11530
Tel. No. 516.248.5550
Fax No. 516.248.6027

February 13, 2023

Via ECF

The Honorable Kenneth M. Karas
United States District Judge for the
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *Jose Hernandez, et al. v. El Bandido Restaurant Inc., et al.*
Docket No. 22-cv-00927 (KMK) (JCM)

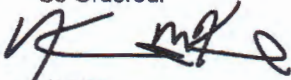
Dear Judge Karas:

We represent the Plaintiffs in the above-captioned case and write in response to the “Pre-Motion Conference Request – Motion for Summary Judgment” filed by the Defendants earlier today, February 13, 2023. As Your Honor may know, on February 20, 2023, the parties are scheduled to mediate this matter with a District-appointed mediator. As such, the parties have conferred and jointly request that Plaintiff’s response to Defendants’ pre-motion conference request be adjourned until February 27, 2023. In addition, the parties request that the deadline for Defendants’ motion for summary judgement, currently February 27, 2023, be adjourned until a date set forth by Your Honor subsequent to the parties’ full submissions on the pre-motion conference request.


We thank the Court for its attention to this matter.

Granted.

So Ordered.


2/14/23

Respectfully submitted,


Michael J. Borrelli, Esq.
For the Firm

To: All counsel *via* ECF.